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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER PRI-
VACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF AMANDA M.
AYCOCK IN SUPPORT OF FACEBOOK,
INC.'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL CERTAIN
MATERIALS ATTACHED TO
FACEBOOK, INC.'S RESPONSE TO
ORDER RE ADI COMMUNICATIONS**

1 I, Amanda M. Aycock, hereby declare as follows:

2 1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for
3 Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the
4 State Bar of New York. I submit this declaration in support of Facebook’s Administrative Motion to
5 File Under Seal Certain Materials Attached to Facebook, Inc.’s Response to Order re ADI Communi-
6 cations. I make this declaration on my own knowledge, and I would testify to the matters stated herein
7 under oath if called upon to do so.
8

9 2. Attached as **Exhibit 5-A** is a true and correct **redacted** copy of Exhibit 5 to Facebook’s
10 Response to Order re ADI Communications, bearing Bates Number FB-ADI-INCAMERA-
11 0000000262.
12

13 3. Attached as **Exhibit 5-B** is a true and correct **unredacted** copy of Exhibit 5 to Face-
14 book’s Response to Order re ADI Communications, bearing Bates Number FB-ADI-INCAMERA-
15 0000000262.

16 4. Facebook proposes redacting confidential technical information regarding access to Fa-
17 cebook’s proprietary data systems.¹ I understand that, if publicly disclosed, hackers and other bad
18 actors also could potentially use this information to better understand Facebook’s data systems and
19 target specific repositories of data, which may harm both Facebook and its users.
20

21
22 I declare under penalty of perjury under the laws of the United States of America that the fore-
23 going is true and correct.
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28 ¹ FB-ADI-INCAMERA-0000000262 at 1–2, 5–6, 8–9.

1 Executed on January 27, 2023 in New York, New York.

2
3 /s/ Amanda M. Aycock

4 Amanda M. Aycock
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